



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

Ramon VASQUEZ-Padilla,

Defendant.

Magistrate Case No.: '08 MJ 8506

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960  
Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about June 4, 2008, within the Southern District of California, defendant Ramon VASQUEZ-Padilla did knowingly and intentionally import approximately 13.06 kilograms (28.73 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

ENRIQUE TORREGROSA  
Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 5<sup>TH</sup>  
DAY OF JUNE 2008.

PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.  
Ramon VASQUEZ-Padilla

3 STATEMENT OF FACTS

4 This complaint is based on the reports, documents, and notes furnished to U.S.  
5 Immigration and Customs Enforcement Special Agent Enrique Torregrosa.

6 On June 4, 2008, at approximately 1841 hours, Ramon VASQUEZ-Padilla entered  
7 the United States from the Republic of Mexico via the Calexico, California, west Port of  
8 Entry, driving a 1996 Dodge Caravan bearing Baja California Mexican plate number  
9 BEJ7054. VASQUEZ was sole occupant driver and register owner of the vehicle.

10 At primary inspection, VASQUEZ gave an oral negative Customs declaration to  
11 Customs and Border Protection Officer (CBPO) Kierepka. CBPO Kierepka asked  
12 VASQUEZ about the ownership of the vehicle and his destination. VASQUEZ stated he  
13 owned the vehicle for about eight months and he was going shopping. CBPO Kierepka  
14 noticed VASQUEZ was nervous, trembling of hands and avoided eye contact. CBPO  
15 Kierepka referred VASQUEZ and the vehicle to the vehicle secondary.

16 Upon arrival to the vehicle secondary lot, CBPO A. Garcia requested CBP Canine  
17 Officer J. Jones to screen the vehicle with his assigned Human/Narcotic Detector Dog  
18 (HNDD). CBP Canine Officer Jones screened the vehicle and informed CBPO A. Garcia  
19 of his HNDD alert to the floor of the vehicle. CBPO A. Garcia obtained a negative Customs  
20 declaration and asked VASQUEZ about the ownership of the vehicle. VASQUEZ stated  
21 he owned the vehicle for about eight months. CBPO Kierepka further inspected the vehicle  
22 and discovered several packages hidden within a specially built compartment located  
23 behind the driver's side seat. CBPO probed one of the packages and extracted a green  
24 leafy substance, which field tested positive for marijuana. CBPO Kierepka removed a total  
25 of thirty-five packages from the compartment and obtained a net weight of 13.06 kilograms  
26 (28.73 pounds) of marijuana.

27 Special Agent Torregrosa advised VASQUEZ of his rights per Miranda which he  
28 acknowledged and waived. VASQUEZ stated he was going to be paid \$1,500.00 to  
smuggle marijuana into the United States.